

EXHIBIT 3b

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

IMPLICIT, LLC,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 6:16-CV-00080-JRG
)	
TREND MICRO, INC.,)	
)	
Defendant.)	
_____)	

NONCONFIDENTIAL PORTIONS

VIDEO-RECORDED DEPOSITION OF
DANIEL S. DECASPER, VOLUME II

Tuesday, October 3, 2017
Redwood Shores, California

Reported By:
Hanna Kim, CLR, CSR No. 13083
Job No. SF-144315

1 A. Okay.

2 Q. Okay. And by a minute, I mean a long
3 time.

4 And so --

5 A. So we're done with this?

04:05:59

6 Q. Yes.

7 I would like to -- we're going to look at
8 your thesis again, please, starting on page 5.

9 So that sentence we were looking at at the
10 top of page 5 -- sorry, that paragraph, it -- it

04:06:33

11 ends in the sentence, "We discuss the Type 4
12 extensions separately from the Type 5 extensions
13 because, as we will show, they are partly
14 orthogonal."

15 A. Yep.

04:06:48

16 Q. Sitting here today, do you have any
17 recollection of what you meant when you wrote that?

18 A. I believe so, yes. I think -- so in the
19 router plugins case, there was not administration
20 action needed to get the code onto the device,
21 right, and -- and connect the two network flows,
22 packets. And while the active network piece shares
23 a lot of the other components of the router plugins,
24 this one, it doesn't, right. It has -- it has a
25 basically fundamentally different model. It's

04:07:03

04:07:27

1 assuming that -- it's inspecting packets and then,
2 based on what it sees, it automatically goes and
3 fetches code and has that executed on those packets
4 if it's not already present.

5 Q. So a packet comes in off of the interface
6 and it's initially scanned for a selector, correct?

04:07:48

7 A. Right.

8 Q. If it has no selector, then it's processed
9 in one way, but if it has a selector, then it's
10 processed according to the sequence of functions and
11 parameters that are included in the packet itself?

04:08:06

12 A. Sort of.

13 Q. And I guess we -- we'll dig into the
14 details.

15 A. Okay.

04:08:27

16 Q. But the one thing you said, I want to
17 clarify, is you said it can go get it. That will
18 only happen if the node, the active node -- strike
19 that.

20 If -- if the selector indicates somewhere
21 in the chain of processing that a function is
22 required that the node doesn't presently support,
23 then it will go --

04:08:41

24 A. Correct.

25 Q. -- and get it from a code server?

04:08:55